

Robert C. Rogers
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Saginaw, MI 48603

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MAY 13 1991

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

9 May 1991

Secretary
Federal Communications Commission
Washington DC 20554

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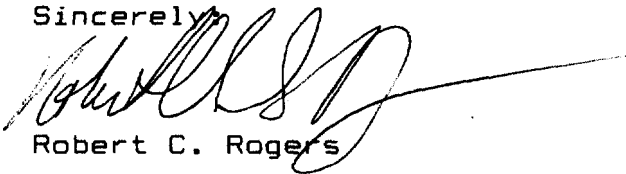
MAY 13 1991

FCC MAIL BRANCH

Dear Sir:

Enclosed is replies to comments regarding RM-7681. As specified in Part 1 of the rules and regulations the appropriate amount of copies are enclosed.

Sincerely,


Robert C. Rogers

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 13 1991

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FILE

In the Matter of)
)
Amendment of Sections)
97.109e regarding)
automatic control under)
50 MHz.)

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-7681

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MAY 13 1991

Replies to comments on RM-7681 filed by the applicants Robert C. Rogers N8FAU, Donald La Brenz II WB8I, and George Schemm N8JAT. These are general replies to comments on RM-7681.

The experiment has gone on in excess of four years. We believe that sufficient data exists and the experiment concluded. It has been stated that the data has never been studied or released to the amateur radio community in any form. While this may be true, that in and of itself should not be reason to continue the experiment under the auspices of a special temporary authority (STA).

Subbands chosen under RM-7681 were chosen to minimize interference and to lessen the impact on existing packet networks on the 10 meter and greater wavelength bands.

It has been stated that some of the concerns of automatic control is minimizing interference and the use of minimum power necessary to facilitate communications.

We believe that packet radio by its very nature to be a polite mode that defers transmissions while other packet stations are transmitting. Network stations need to be very close to the "network frequency" for stations to pass messages effectively. By the nature of the mode this prevents frequency spreading.

97.313a deals with minimum power requirements and it continues to be a judgement that must be made by the licensee or the control operator for the desired communications.

Message content is dealt with in section 97.113a through 97.113e as well as 97.115 a through c which covers the definitions of prohibited and/or illegal communications. We further believe that current software technology to implement necessary safeguards to prevent prohibited or illegal communications from taking place exists.

We agree that the amateur radio service to be self-policing service. It is further believed that self-policing with the advent of AX-25 protocol will not be any more difficult than any other digital, analog or spread spectrum mode.

All of the petitioners are currently or have served as emergency coordinators in the Amateur Radio Emergency Service, an organized emergency communications group. With this experience, we believe, it is ill advised to establish and or develop new networks during times of emergency. Experience has proven that existing networks are more reliable and can be utilized in the shortest possible time.